



Bayer CropScience

481767-00

21 May 2010

Jose Gayoso, Chemical Review Manager  
Risk Management and Implementation Branch 2  
Pesticide Re-evaluation Division (7508P)  
Office of Pesticide Programs  
U. S. Environmental Protection Agency  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460

RE: Generic DCI ID# RR-128850-28862. Glufosinate, 90-Day Response.  
Glufosinate-ammonium Technical (EPA Registration Number 264-645),  
Glufosinate-ammonium 50 MUP (EPA Registration Number 264-646)  
Also Supporting the End Use Products:  
Liberty® 280 SL Herbicide (EPA Registration Number 264-829)  
Liberty® Herbicide (EPA Registration Number 264-660)  
Finale® Herbicide (EPA Registration Number 432-1229)  
Rely® Herbicide (EPA Reg. No. 264-652)  
Remove™ Herbicide (EPA Reg. No. 264-663)  
Liberty® ATZ Herbicide (EPA Reg. No. 264-668)

Dear Mr. Gayoso:

As a follow-up to the Bayer CropScience 90 day response to the Agency "Data Call In" for glufosinate-ammonium, please consider the following:

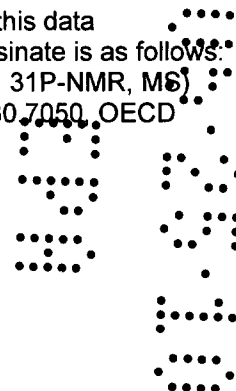
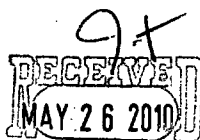
**1). OPPTS Guideline 835.6100 & 835.6200. Environmental Fate Data Requirement (ILV of Soil and Water Method of Analysis). Time Frame of 24 Months.**

In a previous response to the Agency regarding this data requirement (26 March 2010) BCS indicated that method DGM F09/97-0, would be more suitable to provide the desired level of confidence and that this method would be independently validated rather than AL 38/85 that was originally used to support three terrestrial field dissipation studies. Two attempts have been made to validate Method DGM F09/97-0 by an independent laboratory. This validation has not been successful. As such and as noted earlier, BCS would propose the following:

- a. BCS will initiate additional method development work in late 2010/early 2011, with submission of a status update to the Agency by **15 April 2011**.
- c. By **15 June of 2011**, BCS will submit a status update/validation protocol to the Agency and conduct the standard validation prior to placing the method with an independent laboratory for validation.
- d. By **15 September 2011**, BCS will submit the ILV protocol to the Agency and place the method with an independent laboratory for validation of the revised method of analysis with submission of the final reports to the Agency by **30 December 2011**.

**2). OPPTS Guideline 830.7050. Product Chemistry. UV/Visible Absorption. Time Frame of 8 Months.**

With this cover letter, BCS is submitting a study completed in 2001 to support this data requirement. The BCS study listing/number for this study conducted with glufosinate is as follows: Bogdoll, B. 2001. Glufosinate. Spectral Data (UV/VIS, IR, 1H-NMR, 13C-NMR, 31P-NMR, MS) and Molar Extinction Coefficient. EPA Product Properties Guideline OPPTS 830.7050, OECD Guideline 101. BCS Study Number C011181, M-200356-01-1.





Bayer CropScience

Attached to this cover letter, please also find the following:

- 1). A completed copy of EPA Form 8570-1.
- 2) A completed copy of Certification with Respect to Citation of Data (EPA Form 8570-34
- 3). A completed copy of the Data Matrix (including a blackened copy for public view) EPA Form 8570-35
- 4). Transmittal Document (Document 1 of 2) addressing the submission of the UV/VIS study report.

Please contact me at your earliest convenience if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike See", is written over the word "Sincerely,".

Mike See, Ph.D.

Registration Manager

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## **Transmittal Document**

Document 1 of 2

### **OPPTS 830 Series Guideline**

**OPPTS 860.7050**

**OPPTS Guideline 830.7050. Product Chemistry. UV/Visible Absorption**

### **In Support Of**

**Glufosinate-Ammonium Technical Herbicide (EPA Registration Number 264-645)  
Liberty® 280 Herbicide (EPA Registration Number 264-829)**

### **Transmittal Date**

21 May 2010

Company Official:  (signature)

Company Name: Bayer CropScience

Company Contact: Mike See

Telephone: (919) 549-2913

### Bibliography of Submitted Studies

**Product (EPA Registration Number):** Glufosinate-ammonium Technical (EPA Reg. No. 264-645)

**Purpose of Submission:** Follow-up to the Bayer CropScience 90 day response to the Agency "Data Call In" for glufosinate-ammonium Agency request for Product Chemistry data.

**Date of Submission:** 21 May 2010

Doc. Number	Study Reference	Submitter Document Number	EPA Guideline Number	EPA MRID Number
1 of 2	Transmittal Document	NA	NA	NA
2 of 2	Bogdoll, B. 2001. Glufosinate. Spectral Data (UV/VIS, IR, 1H-NMR, 13C-NMR, 31P NMR, MS) and Molar Extinction Coefficient. EPA Product Properties Guideline OPPTS 830.7050, OECD Guideline 101. BCS Study Number C01181, M-200356 01-1..	PA00/028	830-7050	48176701

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